



Eclixp Group Limited

Modern Slavery Statement 2020

31 March 2021

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1. Introduction

Eclix Group Limited and its related companies (together, **the Group, we, us, our**), have a moral and legal responsibility to combat the risks of modern slavery in our business and supply chain.

We expect our suppliers to demonstrate the same commitment.

In the Group's 2020 financial year (**FY20**), we undertook development of our Eclix Modern Slavery Policy and Procedure, and began incorporating contractual frameworks with our suppliers to address the risk of modern slavery in our supply chain. We are proud of the steps we have taken to address modern slavery, and will further develop, iterate and monitor compliance with our Modern Slavery Policy through the 2021 financial year and beyond in order to ensure our business and supply chain is free of modern slavery.

This Modern Slavery Statement (**Statement**) has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (**the Act**) by Eclix Group Limited in respect of the financial year ended 30 September 2020. Eclix Group Limited has consulted the principal governing bodies of each related entity covered by this Statement during the preparation of this Statement.

This Statement has been approved by the Board of Directors of Eclix Group Limited.

2. Our business, structure and operations

2.1 Summary

The Group is an established leader in vehicle fleet leasing, fleet management and diversified financial services in Australia and New Zealand. The Group helps consumers and businesses of all sizes access the funds they need to operate through fleet leasing, novated leasing, vehicle sales, and fleet management solutions.

The Group is relentlessly focused on delivering high growth and strong performance to benefit both customers and investors, through:

- **A commitment to customer, first:** delivering outstanding customer experiences through a commitment to customer service and value-adding end-to-end technology.
- **Cut-through proprietary technology:** offering first-to-market innovation via online technology solutions that provide customers a higher level of service across a broader suite of products and services.
- **A highly tuned, diversified funding model:** providing customers access to funding via a number of diversified funding sources, including a capital efficient, securitised funding model that is both cost-effective and low-risk.

The Group is headquartered at our office in St Leonards, New South Wales, Australia. The Group's annual consolidated revenue in the financial year ending 30 September 2020 was \$674,248,000.

We have approximately 470 employees. Our Australian businesses provide services throughout Australia, and our service providers are based primarily in Australia.

2.2 Business

The Group is organised into three primary business units, each of which operates under its own standalone brand: FleetPartners, FleetPlus and Fleet Choice. Each business unit has its own dedicated sales and operations personnel, who report into shared management teams. Corporate functions such as finance, business intelligence, human resources, treasury, legal and compliance are shared across the three business units. Similarly, procurement and supplier engagement is a centralised function shared across the three business units.

2.3 Operations

Our head office is based in St Leonards, New South Wales, Australia, with branch offices in Richmond, Victoria and Brisbane, Queensland. The Group also operates in Western Australia and New Zealand.

We often partner with motor vehicle dealers, repairers, fuel providers, and telematics, software and data providers. These entities are primarily based in Australia and New Zealand.

Our shareholders include persons located in Australia, New Zealand, the United Kingdom, Singapore, Israel and Hong Kong.

2.4 Supply chains

Our business is primarily office based, focussed on the provision of financial services. The main types of supply chains used by our business comprise:

- Acquisition and disposal of motor vehicles, plant and equipment;
- Accident management services;
- In-vehicle monitoring systems, devices and software;
- Maintenance and repair of vehicles;
- Roadside assistance;
- After-market vehicle accessories;
- Funding (financiers and securitisation);
- Professional services (financial, legal, advisory);
- Insurance;
- Vehicle transport;
- Hire cars;

- Commercial property; and
- IT services and equipment.

Within these supply chains, we focus on consistent, long-term arrangements with suppliers who have the same ethical commitments as us.

The vast majority of the goods and services we acquire are from suppliers based in Australia and New Zealand.

3. Risks of modern slavery

We strive to do business with suppliers who demonstrate ethical business practices and values, including in relation to human rights. The risk that modern slavery is present in our supply chain is assessed in a focussed, collaborative matter by relevant internal stakeholders across our Legal, Risk, Procurement and Operations teams. Key risk factors which are assessed include the location of the supplier, the supplier's industry sector, the supplier's employment and hiring practices and our level of influence or control over the supplier.

Having regard to this assessment process, we have evaluated that our exposure to modern slavery risks is low in circumstances where we do business solely in countries with a low incidence of modern slavery. However, the location of our business does not completely remove the risk of modern slavery from our supply chains. We are conscious that our direct suppliers in Australia and New Zealand may have operations and downstream suppliers in countries where modern slavery practices are more prevalent, including those suppliers who manufacture goods with raw materials sourced from high risk countries (for example, motor vehicle and information technology infrastructure manufacturers).

4. Mitigation of modern slavery risks

4.1 Summary

The Group undertakes a range of activities to manage the risks of modern slavery in its operations and supply chains. In particular, through FY20 the Group developed systems to:

- identify and assess potential risk areas in our supply chains;
- monitor potential risk areas in our supply chains;
- provide a mechanism to report potential or actual incidents of modern slavery in our supply chains;
- protect whistleblowers; and
- provide appropriate remediation where incidents of modern slavery have occurred.

4.2 Due diligence

In order to identify and assess the potential risks of modern slavery in our operations and supply chain, during the year the Group's Procurement team developed a risk mapping and due diligence process for our supply chains and operations that prioritised:

- suppliers by the amount of money the Group spends with them;
- suppliers by the categories of goods and services that they provide; and
- countries or regions with known human rights violations and/or large populations of migrant workers, in accordance with the Global Slavery Index.

The Group's Procurement team also took steps to implement a process to conduct a risk assessment of each major supplier prior to engaging that supplier. The Group continues to conduct regular ongoing risk assessments to maintain the currency of those assessments.

The Group will use the results of our risk mapping and risk assessment exercises and any potential risks identified to guide the actions we take to mitigate these risks as outlined in this section. This Statement sets out the results of our findings and provides our assessment of the effectiveness of those actions.

4.3 Supplier adherence

To ensure all those in our supply chain comply with our ethical standards, we have developed a supply chain compliance programme. This includes:

- our risk assessment process as outlined above;
- clearly communicating our expectations and ethics to our suppliers; and
- where practicable, a contractual obligation on our suppliers to commit to an appropriate Modern Slavery Policy, including in respect of the materials and services they receive from third parties.

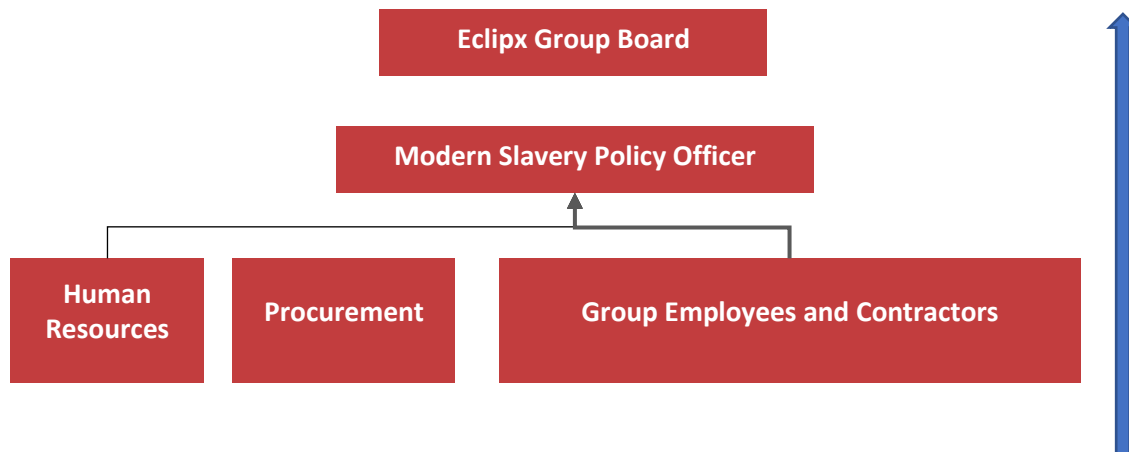
4.4 Training

To ensure a high level of understanding of the risks of modern slavery in our supply chain and our business, we provide training on modern slavery risks to our staff. All new employees are required to complete comprehensive compliance training in relation to, among other compliance obligations, identifying modern slavery and human trafficking risks. Existing employees are required to renew their compliance training biennially. Where an employee fails to complete or renew their mandatory compliance training, a notification is sent to the employee's line manager to ensure that the training is completed. Employee compliance training completion rates are monitored by the Group's Human Resources Team.

Where practicable, we also require our suppliers to provide training to their employees.

4.5 Reporting policy and response plan

The Group's Modern Slavery Policy, developed during FY20, has a formal governance structure to address modern slavery risks, which is illustrated in the diagram below.



At the base of the structure are all employees, contractors and personnel of the Group who have a responsibility to identify and report modern slavery risks to the Modern Slavery Policy Officer. Additionally, the Group's Human Resources and Procurement Teams are specifically tasked with the responsibility to identify and report modern slavery risks in the suppliers that they procure and manage. We make it clear to our employees and contractors that we will not subject them to any repercussions for reporting such risks. Employees and contractors are also able to raise concerns about modern slavery under the protections provided by the Eclipx Whistleblowers Policy. The Whistleblowers Policy also allows the Group's employees and contractors to make a complaint anonymously.

Where a potential incident is brought to the attention of our Modern Slavery Policy Officer, they will consider the modern slavery risk in the first instance and assess whether a formal, in-depth investigation is required.

The Modern Slavery Policy Officer is responsible for the further investigation of potential, or actual, incidents of modern slavery within the Group's operations and supply chains, including whether referral is required to an external investigator.

After completing an investigation, the Modern Slavery Policy Officer must decide whether there is sufficient evidence to confirm that an instance of modern slavery has occurred, and must prepare a report to Eclipx Group Limited's Board which documents the investigation process, the evidence collected and the findings of the investigation. If the Modern Slavery Policy Officer finds that any instance of modern slavery has occurred, the Modern Slavery Policy Officer's report will include recommendations to the Board on ways to address the findings made.

Eclipx Group Limited's Board will in its discretion take action as it sees fit to address any identified instance of modern slavery, including those actions detailed below.

4.6 Remediation

If our investigative processes determine an issue of non-compliance with our policies by one of our suppliers, we will endeavour to have our supplier identify and correct those issues. If it is apparent that an individual has suffered harm as a result of such issue, we will seek to ensure that they are 'made good' by leveraging our position with our supplier.

If a supplier fails to make progress in respect of its required remediation, we may subject it to review and sanctions by leveraging our position with them, including the potential termination of our relationship.

In the event that the Group caused or contributed to the risk, we will take action to prevent that risk and remedy any actual impact as appropriate.

4.7 Other matters

In addition to the above, during the year, we prepared our Modern Slavery Policy which we require our employees, contractors and suppliers to read and acknowledge.

5. Effectiveness

The effectiveness of the Group's management of its modern slavery risk can be evaluated through the number of actual or potential modern slavery issues identified by employees, management or the public in the Group's operations and supply chain, as well as in the Group's industry peers.

The Group has not identified any such issues in its operations or supply chain, nor has it received any notification of such issues within its own business or those of its industry peers. It is acknowledged, however, that the Group's operations, and those of its primary suppliers, take place entirely within Australia and New Zealand, which have a low incidence of modern slavery.

6. Further steps

Following a review of the effectiveness of the processes we developed in FY20, the Group is committed to remaining vigilant about the risk of modern slavery in its business and supply chains, including by:

- undertaking an annual review of the Group's modern slavery procedures;
- continuing to consider and assess the Group's suppliers and their modern slavery risk, especially when commencing operations in a new area or when engaging new key suppliers;
- considering industry and worldwide trends in modern slavery risk, and adapting our processes to address emerging risks;

- ensuring that modern slavery compliance clauses are incorporated into existing supplier contracts which come up for renewal; and
- undertaking any other measures which are appropriate to address the Group's modern slavery risks.

7. Other information

During FY20, the Group made adjustments to its business to maintain operational flexibility in the context of the COVID-19 pandemic, including by:

- instituting work-from-home arrangements for its employees and contractors; and
- proactively reaching out to customers to offer lease extensions in lieu of vehicle renewals.

Additionally, the Group disposed of two non-core operating entities during FY20, being Right2Drive and CarLoans.com.au.

These changes during the financial year nominally reduced the number of suppliers from whom the Group procures services and the volume of supplies procured from certain suppliers, however they did not affect the Group's overall modern slavery risk.

8. Approval

This Statement is made pursuant to section 14(1) of the Act and constitutes the Modern Slavery Statement for the financial year ending 30 September 2020 for Eclix Group Limited, as a Joint Statement, inclusive of the relevant subsidiaries of Eclix Group Limited to which the Act applies. In Australia, these subsidiaries are Fleet Partners Pty Ltd, Pacific Leasing Solutions (Australia) Pty Ltd, Leasing Finance (Australia) Pty Ltd and Fleet Holding (Australia) Pty Ltd. Eclix Group Limited, as the ultimate holding company of the relevant subsidiaries, is in a position to control each reporting entity covered by this Statement, and this Statement has been approved by the Eclix Group Limited Board of Directors on 29 March 2021 for the purposes of section 16(2)(b)(i) of the Act.



Kerry Roxburgh, Chairman

Date: 31 March 2021